

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

MONICA MORRISON,

Plaintiff,

v.

ROBERT LANGRICK,

Defendant.

CASE NO. 1:18-cv-06127 (CBA)(RML)

**DEFENDANT ROBERT LANGRICK'S SECOND SET OF INTERROGATORIES TO
PLAINTIFF MONICA MORRISON**

Pursuant to Federal Rules of Civil Procedure 26 and 33, Defendant hereby submits his Second Set of Interrogatories to Plaintiff Monica Morrison. In accordance with Rule 33, Plaintiff is directed to provide written responses and any objections to these Interrogatories within thirty (30) days of service. Each Interrogatory must, to the extent it is not being objected to, be answered separately and fully in writing under oath.

DEFINITIONS

1. "Ms. Morrison," "you," and "your" mean Monica Morrison, Plaintiff in the above-captioned action, and any present or former agents, representatives, attorneys, and any Person acting or purporting to act on Your behalf.
2. "Defendant" means Robert Langrick, Defendant in the above-captioned action.
3. "Complaint" means the Complaint Plaintiff filed against Defendant on November 1, 2018.
4. "Person" means any natural person or any business, legal, or government entity or association.

5. “Communication” means any oral or written utterance, notation, or statements of any nature whatsoever, by and to whomever made, including, but not limited to, correspondence, conversations, dialogues, discussions, interviews, consultations, and other understandings between or among two or more persons, whether face-to-face, or by telephone, fax, letter, email, website, blog, social-media service, or any other means.

6. “The Alleged Sexual Assault” means the sexual assault you allege Mr. Langrick inflicted on you on or about May 8, 2005 in Hanover, New Hampshire.

7. The terms “relating to” and/or “referenced” mean relating to, reflecting, concerning, referencing, constituting, embodying, connected to, in connection with, comprising, regarding, evidencing, describing, identifying, stating, analyzing, containing information concerning, and/or in any way pertaining to the subject matter of this action.

8. The terms “state,” “explain,” and “describe” mean to set forth a complete and detailed statement of all information, circumstances, and facts that concern, refer to, relate to, reflect, comprise, or bear upon the matter concerning which information is requested.

9. The term “identify” means: (a) when used in reference to a natural individual, state his or her full name, address, and telephone number; (b) when used in reference to a corporation or other business association, state its full corporate or entity name, and any names under which it does business; (c) when used in reference to a Communication, if any part of the Communication was written, identify the document or documents which refer to, relate to, or evidence the Communication, and, to the extent that the Communication was non-written, identify the Persons participating in the Communication, and State the date and substance of the Communication.

INSTRUCTIONS

1. The defined terms shall have the meanings set forth above, regardless of whether they are capitalized or not.

2. To bring within the scope of these Interrogatories all information that might otherwise be construed to be outside their scope, the following rules of construction apply: (a) the singular shall include the plural and vice versa; (b) the masculine, feminine, or neuter pronoun shall not exclude other genders; (c) the connectives “and” and “or” shall be read either disjunctively or conjunctively as necessary to bring within the scope of these Requests for Production all responses that might otherwise be construed to be outside their scope; (d) the terms “any,” “all,” or “each” shall be read to mean including without limitation; (f) the present tense shall be construed to include the past tense and vice versa; and (g) references to employees, officers, directors, or agents shall include both current and former employees, officers, directors, and agents.

3. You must answer each Interrogatory fully, completely, in writing, and under oath. Your responses shall include all information known to you or otherwise in your possession, custody, or control, regardless of location, including in the possession, custody, or control of any current or former attorneys, consultants, experts, agents, employers, editors,

4. If you object to any part of an Interrogatory, you must set forth your basis for the objection and respond to all parts of the Interrogatory to which you do not object.

5. If in the course of responding to these Interrogatories you encounter any ambiguity in the Interrogatories, in a definition, or in an instruction relevant to the Interrogatories, explain what you find to be ambiguous and what construction you used in providing your answer.

6. If you object to any Interrogatory on the grounds that responding is unduly burdensome, you must describe and explain the nature of the undue burden.

7. If any information called for by any Interrogatory is withheld because you claim that such information is protected from discovery by the attorney-client privilege, the work product doctrine, or by any other privilege or protection from disclosure, provide a description of the basis of the claimed privilege and all information for the Court and Defendant to assess the claim of privilege in accordance with applicable federal and local rules, including: (a) applicable subject matter; (b) the applicable date; and (c) the identity of any Person or Persons who authored, made, received, or otherwise learned of the Communication or information.

8. These Interrogatories are continuing in nature, up to and during the course of trial. In the event that You obtain additional information that is responsive to these Interrogatories, you shall promptly supplement your response to each such Interrogatory.

9. No paragraph of these Interrogatories shall be construed with reference to any other paragraph for purpose of limitation.

INTERROGATORIES

INTERROGATORY NO. 12:

Identify any and all mental health diseases, conditions, and/or disorders that you have been diagnosed as having, and for each state the approximate date of the diagnosis, the name and address of the healthcare provider that made the diagnosis, and any medications that you are taking or have taken to treat the disease, condition, or disorder.

INTERROGATORY NO. 13:

Describe the call that you placed to “Defendant’s employer’s Human Resources Department” on January 2, 2018, as described in paragraph 14 of the Complaint, and in answering, please state which person(s) you spoke to, exactly what you said during the call, and what the person(s) that you spoke to said during the call.

INTERROGATORY NO. 14:

Describe all communications you or your counsel have had with Jacqueline Rizk, an individual identified on Plaintiff's Initial Disclosures dated February 6, 2019. In answering, please state how Plaintiff knows Ms. Rizk, how Plaintiff and/or her counsel came to be in contact with Ms. Rizk, and what information Ms. Rizk has communicated concerning Defendant.

INTERROGATORY NO. 15:

Identify each of the "small number of confidants" referenced in paragraph 9 of the Complaint, and for each person, state what information you communicated to that person regarding Mr. Langrick and the date(s) of those communications.

Dated: March 14, 2019

Respectfully Submitted,

/s/ Andrew C. Phillips

Thomas A. Clare (admitted *pro hac vice*)
Elizabeth M. Locke (admitted *pro hac vice*)
Andrew C. Phillips (admitted *pro hac vice*)
Shannon B. Timmann (admitted *pro hac vice*)
CLARE LOCKE LLP
10 Prince Street
Alexandria, VA 22314
Telephone: (202) 628-7400
Email: tom@clarelocke.com
Email: libby@clarelocke.com
Email: andy@clarelocke.com
Email: shannon@clarelocke.com

Daniel A. Singer (DAS 0978)
THE LAW OFFICES OF DANIEL A. SINGER PLLC
New York, New York 10017
Telephone: (212) 569-7853
Email: dan@singerlaw.com

*Attorneys for Defendant-Counterclaimant
Robert Langrick*

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of Defendant's Second Set of Interrogatories to Plaintiff Monica Morrison in the above captioned matter was served on the below counsel of record on March 14, 2019, in accordance with the Rules of Civil Procedure:

Henry Kaufman
Henry R Kaufman PC
60 East 42nd Street, 47th Floor
New York, New York 10168
Telephone: (212) 880-0842
Email: hkaufman@hrkaufman.com

Carol S. Schrager
Law Offices of Carol A. Schrager
Empire State Building
350 Fifth Avenue
Suite 4307
New York, New York 10118
Phone: (212) 213-0657
Email: CarolASchrager@gmail.com

Attorneys for Plaintiff Monica Morrison

Dated: March 14, 2019

By: /s/Andrew C. Phillips
Andrew C. Phillips